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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

RESPONSES OF UNITED STATES POSTAL SERVICE TO QUESTIONS POSED BY THE COMMISSSION DURING CROSS-EXAMINATION ON OCTOBER 28, 2011 (Tr. Vol. 5)

The United States Postal Service hereby provides the responses to questions posed by the Commission during the evidentiary hearing on October 28, 2011. The questions are paraphrased and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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1. If during the RAOI process, an office under review has its hours of operation reduced (for example from 20 to 15 hours), how does this information become a part of the discontinuance record to ensure appropriate review by those making the final determination to close a facility?

RESPONSE

Hours of operation are a basic fact about the office that must be reflected correctly in the administrative record and final determination. If that information changes, the administrative record needs to reflect that fact, whether by an updated Form 4920 (or its CSDC equivalent), or perhaps even a memo to the record by the discontinuance coordinator.

2. Page 15, line 20 of witness Boldt's surrebuttal testimony, "while it may have been true in the past that tens of thousands of active employees had access to CSDC-1, including national officers of postal management associations, the application of a need-to-know constraint is true of all postal applications, especially in today's SOX environment. As with a wide variety of other postal data systems, CSDC-II now operates to deprive employeesfrom access to the current CSDC II system." What is the connection between CSDC and SOX compliance?

RESPONSE

The connection is not a direct one. The simple observation is that the need for checks and balances, constraint upon who needs what information for what purpose, and who can change what data for any purpose, is increasingly necessary and appropriate in postal data systems as in any other data systems. SOX is a relatively well-known example of where checks upon data entry, data maintenance, and data changes are systematized as a way of providing additional security against fraudulent or wasteful conduct. That is the only intended connection.

3. What criteria does the Postal Service use to determine whether a postal retail facility will obtain a POS terminal?

RESPONSE

Until FY 2011, Point of Sale terminals were only in Cost Ascertainment Group A-G offices. In FY2011, the Postal Service extended POS to include offices with annual walk-in revenue greater than \$100K. The Postal Service is in the process of converting those offices in FY 2012 (most of them are currently Integrated Retail Terminal offices).

4. Please provide a list of the post offices on the RAOI candidate list that do not have access to the Postal Service's intranet.

RESPONSE

See the attached list of RAOI low earned workload Post Offices that do not have inter/intranet access.

Attachment to Response to PRC October 28 Question HR Question 4

RAO Initiative
Low Earned Worklaod
Post Offices
W/O Intra/Internet Access

Office	Finance Number	Туре	Zip	Address	City	State
POINT BAKER	027098	MAIN_PO	99927	9998 STATE FLOAT	POINT BAKER	AK
ARTOIS	050354	MAIN_PO	95913	357 FRONT ST	ARTOIS	CA
SARGENTS	078100	MAIN_PO	81248	174 MEANS AVE	SARGENTS	СО
SAINT DONATUS	188019	MAIN_PO	52071	118 E 1ST ST	SAINT DONATUS	IA
AMO	170187	MAIN_PO	46103	4925 PEARL ST	AMO	IN
BRADFORD	170781	MAIN_PO	47107	3314 W BRADFORD RD NE	BRADFORD	IN
CENTRAL	171593	MAIN_PO	47110	7020 CENTRAL DR SW	CENTRAL	IN
FRIENDSHIP	173113	MAIN_PO	47021	5918 E MAIN ST	FRIENDSHIP	IN
PIERCEVILLE	176941	MAIN_PO	47039	4499 E STATE ROUTE 350	PIERCEVILLE	IN
ALPHA	200112	MAIN_PO	42603	234 OLD HAPPY TOP RD	ALPHA	KY
BASKETT	200440	MAIN_PO	42402	1015 2ND AVE	BASKETT	KY
CANE VALLEY	201236	MAIN_PO	42720	2303 CANE VALLEY RD	CANE VALLEY	KY
CANNEL CITY	201252	MAIN_PO	41408	9519 HIGHWAY 191	CANNEL CITY	KY
ELIZAVILLE	202444	MAIN_PO	41037	5035 ELIZAVILLE RD	ELIZAVILLE	KY
FORDS BRANCH	202864	MAIN_PO	41526	2730 KEWANEE RD	FORDS BRANCH	KY
HIMA	203744	MAIN_PO	40951	HIGHWAY 80 E	HIMA	KY
HOLLAND	203800	MAIN_PO	42153	8384 HOLLAND RD	HOLLAND	KY
JETSON	204120	MAIN_PO	42252	10339 BROWNSVILLE RD	JETSON	KY
KENTON	204228	MAIN_PO	41053	14079 DECOURSEY PIKE	KENTON	KY
KNOB LICK	204340	MAIN_PO	42154	5260 SULPHUR WELL KNOB LICK RD	KNOB LICK	KY
LONE	204752	MAIN_PO	41347	2297 HIGHWAY 708 W	LONE	KY
MALONE	204984	MAIN_PO	41451	2570 HIGHWAY 191	MALONE	KY
MASON	205100	MAIN_PO	41054	8415 DIXIE HWY	MASON	KY
MILFORD	205228	MAIN_PO	41061	6503 POWERSVILLE HARRISON COUNTY RD	MILFORD	KY
MUSES MILLS	205520	MAIN_PO	41065	6 RYAN RD	MUSES MILLS	KY
PLUMMERS LANDING	206208	MAIN_PO	41081	591 PLUMMERS LANDING RD	PLUMMERS LANDING	KY
SITKA	206248	MAIN_PO	41255	2474 KY ROUTE 201	SITKA	KY
WEST LOUISVILLE	208244	MAIN_PO	42377	7005 STATE ROUTE 815	WEST LOUISVILLE	KY

WINDSOR 208436 MAIN_PO 42565 3593 KY 80 WINDSOR F WOODBURY 208516 MAIN_PO 42288 74 BARREN RIVER RD WOODBURY F CUTTYHUNK 241683 MAIN_PO 2713 13A BROADWAY CUTTYHUNK M MC GRATH 265820 MAIN_PO 56350 300 MAIN ST W MC GRATH M MARYSVILLE 295544 MAIN_PO 59640 1 ASPEN WAY MARYSVILLE M BOWERSVILLE 380959 MAIN_PO 45307 3180 MAYSVILLE ST BOWERSVILLE DOWERSVILLE MARYSVILLE MARYSVILLE MAIN_PO 45307 3180 MAYSVILLE ST BOWERSVILLE COLTON COLTON 381764 MAIN_PO 43500 3582 MAIN ST COLTON COLTON COLTON COLTON G471 HUFF HILL RD DECATUR COLTON COLTON COLTON COLTON G471 HUFF HILL RD DECATUR COLTON COLTON G471 HUFF HILL RD DECATUR COLTON COLTON G451 HURS G451 HURS G451 HURS	14/11 DIE	MAIN B	0 10100		14/11 515	100
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WREN 389184 MAIN_PO 45899 119 STATE ROUTE 49 WREN C	WREN	389184 MAIN_P	O 45899	119 STATE ROUTE 49	WREN	ОН
MANNBORO 515598 MAIN_PO 23105 3800 RICHMOND RD MANNBORO \	MANNBORO	515598 MAIN_P	O 23105	3800 RICHMOND RD	MANNBORO	VA
MEREDITHVILLE 515820 MAIN_PO 23873 4771 BOYDTON PLANK RD MEREDITHVILLE \	MEREDITHVILLE	515820 MAIN_P	O 23873	4771 BOYDTON PLANK RD	MEREDITHVILLE	VA
SCHLEY 518058 MAIN_PO 23154 5778 WARE NECK RD SCHLEY V	SCHLEY	518058 MAIN_P	O 23154	5778 WARE NECK RD	SCHLEY	VA
STEHEKIN 548148 MAIN_PO 98852 31 DEFACTO LN STEHEKIN V	STEHEKIN	548148 MAIN_P	O 98852	31 DEFACTO LN	STEHEKIN	WA
WALDRON 548946 MAIN_PO 98297 1 S BURN RD WALDRON V	WALDRON	548946 MAIN_P	O 98297	1 S BURN RD	WALDRON	WA

5. During cross-examination of witness Ruiz, he mentioned that he has an annual report going back three years which indicates the hours of operation for each Post Office, branch, and station on the RAOI candidate list as well as annual revenues for each RAOI candidate office during that same timeframe. Please have Mr. Ruiz search his records and provide the information he has pairing hours of operation and walk-in revenue for those offices for the last three years.

RESPONSE

Mr. Ruiz has checked his records. As he indicated at page 1778 of Tr. Vol. 5, he has an archival one-time snapshot in the Small Office Variance database of what the operating hours were reported to be on the final week of each of the past three fiscal years (FY 2009, 2010 and 2011) for retail facilities in SOV. The data are filed in USPS Library Reference N2011-1/NP22, which is accompanied by the public version in USPS Library Reference N2011-1/26 from which facility finance numbers have been redacted.

FY 2008-10 walk-in revenues for all retail facilities were filed in USPS Library Reference N2011-1/25 on October 26, 2011.

6. Please provide the most updated list possible of RAOI candidate offices that have had a Final Determination to Close the facility posted in that facility. Similarly, please provide the most updated list possible of RAOI candidate offices that have been removed from consideration for closure under the Initiative.

RESPONSE

As of November 1, 2011, no Final Determinations have been posted as part of the RAO Initiative. An updated USPS Library Reference N2011-1/11 is being filed today, as previously scheduled, to reflect the RAO Initiative candidate facilities eliminated from consideration as of the end of October, 2011.